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Thursday, 25 September, 2008 03:28:15 PM  
Clerk, U.S. District Court, ILCD

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF ILLINOIS  
AT SPRINGFIELD

UNITED STATES OF AMERICA, )  
                                  )  
Plaintiff,                    )  
                                  )  
V.                            )  
                                  )  
SHEILA BRIGGS, JOYCE CARTER, )  
DOLORES CROZIER,            )  
KIMBERLY DALLAS,            )  
L. DEANNA DEAN, TINA FLYNN, )  
JOYCE GAGE, DORIS GROTH,    )  
BARBARA JONES,              )  
ROSEMARY MARRIOTT,          )  
ALECIA McGUIRE,             )  
DANNY RAY ODELL, SHIRLEY OLLIS, )  
LINDA SCOTT, LIBBE SISKIND, )  
FRANCES THOMPSON, and      )  
ERNESTINE VENABLE,          )  
                                  )  
Defendants.                 )

FILED

SEP 24 2008

PAMELA E. ROBINSON, CLERK  
U.S. DISTRICT COURT

CRIMINAL NO. 08-30094 CENTRAL DISTRICT OF ILLINOIS

VIO: Title 18 U.S.C. §§ 2, 371,  
1952(a)(3), and 2422(a).

3:09 CR 82

JUDGE ZOUHARY

INDICTMENT

THE GRAND JURY CHARGES:

Count I

1. Beginning at least as early as February 2007 and continuing to in or about March 2008, at Springfield, in the Central District of Illinois, and elsewhere, the defendants,

SHEILA BRIGGS, JOYCE CARTER, DOLORES CROZIER,  
KIMBERLY DALLAS, L. DEANNA DEAN, TINA FLYNN, JOYCE GAGE,  
DORIS GROTH, BARBARA JONES, ROSEMARY MARRIOTT,  
ALECIA McGUIRE, DANNY RAY ODELL, SHIRLEY OLLIS, LINDA SCOTT,  
LIBBE SISKIND, FRANCES THOMPSON, and ERNESTINE VENABLE,

agreed and conspired with each other and with others, known and unknown to the Grand Jury, to commit the following offenses against the United States:

A. to use facilities in interstate commerce, namely interstate telephone facilities, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of illegal prostitution activities in the states in which the defendants lived, including Alabama, Florida, Illinois, Massachusetts, Michigan, Missouri, North Carolina, Ohio, Pennsylvania, South Carolina, and Tennessee, in violation of Title 18, United States Code, Section 1952(a)(3); and

B. knowingly to persuade, induce, entice, and coerce female individuals to travel in interstate commerce to engage in prostitution in violation of Title 18, United States Code, Section 2422(a).

2. In furtherance of the conspiracy, each defendant operated a business engaged in prostitution in the state in which the defendant lived. The operation of such businesses violated the criminal laws of those states.

3. As a further part of the conspiracy, the defendants persuaded, induced, enticed, and coerced prostitutes to travel in interstate commerce between the various states in which the defendants operated their businesses. In order to allow the defendants and the prostitutes to make money, the defendants provided the prostitutes with a place to engage in prostitution activities and a place to live, and scheduled and arranged for customers for the prostitutes.

4. As a further part and in furtherance of the conspiracy, the defendants made and caused to be made interstate telephone calls. In those telephone calls the defendants discussed the attributes and character of various prostitutes who worked at their businesses. In those telephone calls the defendants also discussed having prostitutes travel from one of their businesses to another business. On many occasions the prostitutes would travel between states in order to go from one of the defendants' businesses to another of the defendants' businesses. It was mutually beneficial to the defendants and the

prostitutes to have the prostitutes move periodically from one business to another business.

5. In furtherance of the conspiracy, the defendants committed the following overt acts:

A. On or about October 29, 2007, in an interstate telephone conversation, L. Deanna Dean and Shelia Briggs discussed Briggs' prostitution business and the attributes and character of prostitutes they called Lisa, Amanda, Sarah and Brandi.

B. On or about January 11, 2008, in an interstate telephone conversation, L. Deanna Dean and Joyce Carter discussed the attributes of a prostitute called Ashley.

C. On or about January 8, 2008, in an interstate telephone conversation, L. Deanna Dean asked Dolores Crozier to provide her with the names of good prostitutes looking for a "good place to work."

D. On or about January 18, 2008, in an interstate telephone conversation, L. Deanna Dean and Kimberly Dallas discussed the attributes of a prostitute called Butterfly and having her travel from South Carolina to Springfield, Illinois.

E. On or about January 18, 2008, in an interstate telephone conversation, L. Deanna Dean and Tina Flynn discussed how Flynn's business was doing and whether Flynn knew the location of a prostitute called Cici or Tabitha.

F. On or about December 2, 2007, in an interstate telephone conversation, L. Deanna Dean and Joyce Gage discussed the price that should be charged when two prostitutes are involved with one customer.

G. On or about January 25, 2008, in a telephone conversation, L. Deanna Dean and Doris Groth discussed the attributes and character of prostitutes called Toni and Nicole and when Nicole

would be at their businesses.

H. On or about December 21, 2007, in an interstate telephone conversation, L. Deanna Dean and Barbara Jones discussed when a prostitute called Courtney was coming to their businesses and when a prostitute called Jackie would come to their businesses.

I. On or about January 11, 2008, in an interstate telephone conversation, L. Deanna Dean and Rosemary Marriott discussed the attributes and character of prostitutes called Barb and Terry and how a number of prostitutes were going to "Carolina" and St. Louis.

J. On or about January 11, 2008, in an interstate telephone conversation, L. Deanna Dean and Alecia McGuire discussed how McGuire's business was doing, the attributes and character of a prostitute called Monica and that the prostitutes should travel from McGuire's business in St. Louis, Missouri to L. Deanna Dean's business in Springfield, Illinois.

K. On or about January 18, 2008, in an interstate telephone conversation, L. Deanna Dean and Danny Ray Odell discussed the attributes of a prostitute called Vanessa and Odell providing Dean with young looking prostitutes.

L. On or about January 25, 2008, in an interstate telephone conversation, L. Deanna Dean and Shirley Ollis discussed having a prostitute called Martha travel from outside the State of Illinois to Springfield, Illinois.

M. On or about January 11, 2008, in an interstate telephone conversation, L. Deanna Dean asked Linda Scott if Scott had any young girls coming through her business. Scott said a prostitute was supposed to arrive at Scott's business but never did.

N. On or about December 21, 2007, in an interstate telephone conversation, L. Deanna Dean

and Libbe Siskind discussed whether L. Deanna Dean used older prostitutes. Dean said she did but she also had some younger guys looking for "yuppie younger girls." Siskind said that a prostitute named Chelsea was that type of girl.

O. On or about January 8, 2008, in an interstate telephone conversation, L. Deanna Dean and Frances Thompson discussed that a prostitute called Amanda had come to Thompson's business after Amanda had been beat up. Dean and Thompson discussed that it did not make sense to send Amanda to a new business in that condition.

P. On or about January 8, 2008, in an interstate telephone conversation, L. Deanna Dean and Ernestine Venable discussed that Venable was doing her business from an apartment. L. Deanna Dean asked Venable to tell her of any good prostitutes that come through Venable's business and that Venable should contact a prostitute called Joyce in Youngstown, Ohio.

Q. On or about October 31, 2007, in an interstate telephone conversation, L. Deanna Dean and a prostitute called Tammy discussed Tammy traveling from Ohio to L. Deanna Dean's business in Springfield, Illinois.

R. On or about January 8, 2008, in an interstate telephone conversation, L. Deanna Dean and A.F. discussed A.F. providing L. Deanna Dean with a prostitute called Jessica who would travel from Ohio to L. Deanna Dean's business in Springfield, Illinois.

S. On or about January 25, 2008, in an interstate telephone conversation, L. Deanna Dean and J.C. discussed J.C. providing L. Deanna Dean with a prostitute called Tiffany who would travel from Ohio to L. Deanna Dean's business in Springfield, Illinois.

In violation of Title 18, United States Code, Section 371.

**Count II**

Beginning at least as early as February 2007, and continuing to on or about March 2008, at Springfield, in the Central District of Illinois, and elsewhere, the defendants,

**SHEILA BRIGGS, JOYCE CARTER, DOLORES CROZIER,  
KIMBERLY DALLAS, L. DEANNA DEAN, TINA FLYNN, JOYCE GAGE,  
DORIS GROTH, BARBARA JONES, ROSEMARY MARRIOTT,  
ALECIA McGUIRE, DANNY RAY ODELL, SHIRLEY OLLIS, LINDA SCOTT,  
LIBBE SISKIND, FRANCES THOMPSON, and ERNESTINE VENABLE,**

knowingly persuaded, induced, enticed, and coerced female individuals to travel in interstate commerce at various times between the states of Alabama, Florida, Illinois, Massachusetts, Michigan, Missouri, North Carolina, Ohio, Pennsylvania, South Carolina, and Tennessee, to engage in prostitution in those states.

In violation of Title 18, United States Code, Sections 2 and 2422(a).

A TRUE BILL,  
s/ Foreperson

s/ Assistant U.S. Attorney

RODGER A. MEATON  
UNITED STATES ATTORNEY

PJC